

[Submitting counsel below]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION**

No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.  
LUHANA, ESQ. IN SUPPORT OF JOINT  
LETTER SUBMISSION TO COURT**

This Document Relates to:  
All Cases

Judge: Honorable Lisa J. Cisneros  
Date: \_\_\_\_\_, 2024  
Time: \_\_\_\_\_  
Via \_\_\_\_\_

I, Roopal P. Luhana, declare and state as follows:

1. I am an attorney in the law firm of Chaffin Luhana LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of New York and am admitted pro hac vice to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. I submit this Declaration in support of the parties Joint Letter Brief to the Court pursuant to PTO 14 and PTO 8 regarding Plaintiffs' challenge to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's (collectively "Uber") claims of privilege as to certain documents.

3. Filed as **Exhibit B** is a true and correct copy of a letter filed in *Waymo LLC v. Uber Tech. Inc.*, Case No. 3:17-cv-00939-WHA (N.D. Cal. Dec 15, 2017)(Dkt. 2401-1).

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on June  
2 21, 2024, in Brooklyn, New York.

3 /s/ Roopal P. Luhana  
4 Roopal P. Luhana  
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